

Fuel Oil Non-Availability Report – Supporting Information

To Whom it may Concern,

Aker Philadelphia Shipyard Inc. (APSI) will be performing the first sea trials on APSI Hull 021, OHIO, IMO 9704776, ON 1255199, ABS YY-253083. This is a first of class new build vessel of APSI's MT50 Product Tanker Class leaving dock for the first time for sea trials. APSI's intention is to transit from the Philadelphia Navy Yard facility down the Delaware River. This trial will be conducted within 200 miles of the US coast and at all times below 42 degrees N. latitude. The vessel will be undergoing testing for verification of regulatory bodies and class certification. The vessel is not certified or flagged, but will be attended by United States Coast Guard (USCG) and the American Bureau of Shipping (ABS) for duration of the testing. ABS testing requirements mandate the use of HFO during sea trials to meet regulatory requirements, and verification of main engine capabilities. APSI attempted to procure low sulfur HFO, but was unsuccessful, and applies for this waiver. Compliant fuel (MGO) will be used whenever possible. Also attached is the request letter provided, and accepted, by the USCG for sea trials. APSI uses a broker to find all fuels and lubricants, and the broker contacts all available vendors locally and abroad. A message regarding the pursuit of the low sulfur and ultra low sulfur HFO is attached. Also attached is a preliminary schedule of testing to be performed. Should there be any questions please contact Edward Schehr, information below.

Documents Included:

1. Completed ECA0100 FONAR Form
2. Fuel Oil – Non Availability – Supporting Information
3. Preliminary Sea Trials Testing Schedule
4. APSI Letter to USCG Requesting Sea Trials
5. Information from fuel broker regarding search for fuel

I certify under penalty of law that the statements and information made herein are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines and imprisonment pursuant to 18 U.S.C. § 1001.

Thank you in advance,
Edward Schehr



Edward Schehr
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ECA0100, AKER PHILADELPHIA SHIPYARD, INC., OHIO, US, IMO-9704776, 6/17/2015, PHILADELPHIA, NA, NA, NA, NA, NA, 4, 7/9/2015, 8:00, 3.5, 96, PHILADELPHIA, N, N, NA, NA, NA, NA, NA, 7/14/2015, 18:00, N, NA, NA, N, 1, Mr. Edward Schehr, Edward.Schehr@phillyshipyard.com, 215-875-8837, Attached

Please note that there is no ULSFO (Sulfur 0.10%) and LSFO (Sulfur 1.00%) available in Philadelphia. I have covered all the suppliers in Philadelphia which are:

Aegean Marine Petroleum

299 Park Avenue
2nd Floor
New York, NY 10171 USA
212-536-8343

Chemoil

Chemoil Corporation
Three Stamford Plaza
301 Tresser Boulevard
Stamford, CT 06901-3244
203-328-3162

Global

The Plains Terminal
6850 Essington Avenue
Philadelphia, PA 19153
215-937-6406

Harbor Plaza

2317 Route 34 South, Suite 1F
Manasquan, NJ 08736, USA
732-223-7000

The products that are available are as follows: Please keep in mind method of delivery depends on quantity of fuel and where the vessel is lifting.

HSFO RMG380 (Sulfur 3.50%)
LSFO RME 180 (Sulfur 3.50%)
LS MGO (Sulfur 0.10%)

In Philadelphia please note that as there has not been any demand in the market for LSFO 1.00% and as of January 1st, 2015 none of the suppliers are carrying it anymore in their tanks. We can only get Fuel Oil RME-180 (sulphur max 3.50%) or Fuel Oil RMG-380 (Sulphur max 3.50%) or Low Sulphur MGO (Sulphur max 0.10%).

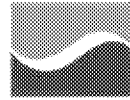
If you need the Low Sulphur Fuel Oil (LSFO) I would advise to take the LS MGO (Sulphur 0.10%) as that is the product that customers are taking in place of the LSFO RME180 or LSFO RMG380.

Kind regards,
Joanne

Joanne Constantine



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May 26, 2015

David Crance Jr.
Sector Delaware Bay
One Washington Avenue
Philadelphia, PA 19147

Re: Sea Trial – Ohio (Official Number 1255199)

Dear Mr. Crance,

APSI requests your office to consider this application for permission to conduct an open ocean sea trial for the Ohio (Official Number 1255199), APSI Hull 021. APSI is finalizing operational services where qualified personnel are required. Your favorable consideration of the following proposal, based on the previous sea trials conducted, is requested.

Personnel

Licensed Deck Officers

- Captain, non-watch standing
- 3 Mates, watch standing

Unlicensed Seamen

- 4 ABs, certified, one of which may be a Bosun rating

Licensed Engine Officers

- Chief Engineer, non-watch standing
- 3 licensed Engineering officers, watch standing

APSI personnel aboard for testing and commissioning activities will support engine room and deck operations, as necessary. Riders/ participants will include an expected 2 to 4 representatives of the Sector Delaware Bay USCG Marine Safety Office, and 2 to 3 representatives of the classification society, American Bureau of Shipping (ABS). All system and equipment testing will be performed by APSI personnel and vendors, with the ship's crew devoted primarily to safe navigation of the vessel.

Safety

The intent is to carry not more than 80 persons past the Delaware River pilot station. To this end, the vessel will be fitted with lifesaving appliances as follows:

Lifeboat/rafts: The vessel is fitted with one side launch rescue boat and one free fall lifeboat with a capacity to accommodate 6 and 25 persons, respectively. Each side will also be fitted with two life rafts with a capacity to accommodate 32 (2x16) persons. Additional life raft capacity will be provided on each side to exceed the total number of persons on board. APSI will test the rescue boat and lifeboat prior to departure to the Delaware River.

Life jackets placed on-board will meet or exceed the total sea trial complement, and will be provided in lieu of using the ship's set. APSI has in hand roughly 80 lifejackets, and will be supplementing additional lifejackets prior to sea trials. These jackets are stenciled "APSI" and were obtained for use on the previous sea trials.

APSI proposes not to carry any additional survival suits, as proposed and approved for the sea trials conducted on prior APSI vessels. This trial will also be conducted within 200 miles of the US coast and at all times below 42 degrees N. latitude. The trained officers provided by the operational services team will organize the crew into emergency squads in response to any emergency. The station bill will also address the mustering locations and duties for all personnel. A loose fire and safety inspection as well as muster drill will be performed prior to departure.

Logistics

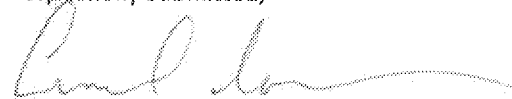
APSI will be conducting a deadweight survey and inclining experiment prior to the sea trial, to ensure that as first of class, the Ohio meets all regulatory requirements for stability and safety. ABS and USCG attendees will be invited to the experiment, and while APSI does not expect the results to be submitted and approved prior to departure, unofficial results will be used as a basis for sufficient seakeeping. It is APSI's intent to conduct all necessary operational dock trials prior to the sea trial in the outfitting dock at the shipyard. This includes all safety and firefighting systems, ballast and cargo systems, as well as bridge and navigation systems.

APSI anticipates conducting the trial commencing on or about Friday June 26th, 2015 and lasting up to 6 days, returning to APSI on or about Wednesday July 1st, 2015. In keeping with the arrangements for previous sea trials, APSI will be implementing a tug assist from the Navy Yard facility in Philadelphia, PA to the Delaware Bay Bridge, at a minimum. APSI expects a 2-3 tug complement, provided by Wilmington Tug, for undocking at the Navy Yard, with 1 tug escorting for the duration of the trip downriver to the Delaware Bay Bridge. Additionally, upon return to anchorage, and prior to transit upriver, APSI will be in contact with the tug operators for return to the Navy Yard.

APSI will have insurance for COFR requirements in place with expected effective date of June 15th, 2015.

Please advise if these arrangements will meet the requirements for the Captain of the Port of Philadelphia to allow APSI to conduct sea trials on this vessel. Thank you in advance, for your consideration in this matter.

Respectfully Submitted,



Eddie Schehr
On behalf of Aker Philadelphia Shipyard

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215-875-8837

CC: Scott Clapham, Senior VP of Projects and Business Improvement, APSI (Email)
John Bond, Project Manager, APSI (Email)
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